

1 **MICHAEL JAY BERGER (State Bar # 100291)**
2 **LAW OFFICES OF MICHAEL JAY BERGER**
3 **9454 Wilshire Boulevard, 6th Floor**
4 **Beverly Hills, California 90212**
5 **T: 1.310.271.6223 | F: 1.310.271.9805**
6 **E: michael.berger@bankruptcypower.com**

7 **Counsel for Creditor,**
8 **Sean McNair**

9
10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **LOS ANGELES DIVISION**

13 **In re**) **Case No.: 2:19-bk-14989-WB**
14) **Chapter 11**
15 **SCOOBEEZ, et al.,**) **Jointly Administered with Case Nos.:**
16) **2:19-bk-14991-WB**
17 **Debtors and Debtors-in-Possession.**) **2:19-bk-14997-WB**
18) **NOTICE OF MOTION AND MOTION**
19) **TO APPROVE STIPULATION**
20) **REGARDING RELIEF FROM**
21) **AUTOMATIC STAY UNDER 11 U.S.C.**
22) **SECTION 362 (ACTION IN NON-**
23) **BANKRUPTCY FORUM);**
24) **DECLARATION OF MICHAEL JAY**
25) **BERGER IN SUPPORT THEREO**
26) **[Hearing Not Required Unless Requested]**

27 **TO THE HONORABLE JULIA W. BRAND, JUDGE OF THE UNITED**
28 **STATES BANKRUPTCY COURT, TO THE UNITED STATES TRUSTEE AND**
29 **TO ALL INTERESTED PARTIES:**

30 PLEASE TAKE NOTICE that Creditor Sean McNair (hereinafter the "Creditor"),
31 hereby moves this Court for an Order Approving the Stipulation entered into between the
32 Creditor, on the one hand, and Scoobur, LLC and Scoobeez Global, Inc. (each a "Debtor"
33 and, collectively the "Debtors"), granting relief from the automatic stay for the limited
34

1 purpose of the Creditor prosecuting the pending McNair Action relating to pre-petition
2 claims, as well as settlement discussions, if any, application or potential application of the
3 Insurance Policy, and related ancillary process.

4 Pursuant to the Stipulation, the Creditor, who is a plaintiff in a lawsuit against the
5 Debtors (Superior Court of California, County of Los Angeles, Case No. BC708263, *Sean*
6 *McNair v. Yareb Ishel Garcia, et al.*) (the “McNair Action”), which predates the above
7 captioned bankruptcy filing, will continue to prosecute the pending McNair Action to
8 completion. Relief will be limited and Creditor shall not seek to enforce his claim against
9 the Debtors, other than to seek recovery under the Insurance Policy for the claims asserted
10 in the McNair Action; and aside from such rights and interests arising under the Insurance
11 Policy, no property of the Debtors’ estates may be disposed of outside the bankruptcy
12 proceedings while they remain pending, unless otherwise ordered.

13 Said ground is supported by this Notice of Motion, by the Motion and the pleadings
14 and papers on file in this bankruptcy case, and by the Declaration in support of the Motion
15 filed herewith.

16 This Motion is brought pursuant to Local Rule 9013(o), which states:

17 **(o) MOTIONS AND MATTERS NOT REQUIRING A HEARING**

18 (1) Matters That May Be Determined Upon Notice and Opportunity to
19 Request Hearing.

20 (OPTIONAL PROCEDURE) Upon not less than 14 day-notice to
21 such creditors and interested parties who are entitled to notice of the
22 particular matter, orders may be obtained on the following types of
23 motions without a hearing unless one is specifically requested by
24 filing and serving a written response that complies with Local
25 Bankruptcy Rule 9013-1(a)(7) and request for hearing within 14 days
26 of the date of service of the notice.

1 If any party in interest desires to object to the request herein, that party must file
2 and serve a written objection and request a hearing within fourteen (14) days of the service
3 of this Notice.

4 Wherefore, the Debtor requests the Court issue its Order approving the Stipulation
5 between the Debtor and the Creditor.

6 Dated: 1/22/2020

7 **LAW OFFICES OF MICHAEL JAY BERGER**

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9 By:

10 Michael Jay Berger
11 Counsel for Creditor
12 Sean McNair
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 Scoobeez, Debtor and Debtor-in-Possession (“Debtor”) in the above-referenced
4 Chapter 11 case, commenced its bankruptcy case by filing a voluntary petition under
5 Chapter 11 of the Bankruptcy Code on April 30, 2019. Debtor’s case is jointly
6 administered with the related debtors Scoobeez Global, Inc. and Scoober, LLC (Case
7 Numbers: 2:19-bk-14991-WB and 2:19-bk-14997-WB) (collectively referred to as the
8 “Debtors”).

9 Creditor Sean McNair (“Creditor”) is the plaintiff in a prepetition lawsuit against
10 the Debtors filed in the Superior Court of the State of California County of Los Angeles
11 (Case No. BC708263, *Sean McNair v. Yareb Ishel Garcia, et al.*) (the “McNair Action”).
12 A true and correct copy of the Complaint in the McNair Action is attached hereto as
13 **Exhibit “1.”**

14 Upon the commencement of the Debtors’ Chapter 11 cases, the commencement of
15 any action relating to, and any attempt to collect on the McNair Action was stayed under
16 section 362(a) of the Bankruptcy Code.

17 Creditor and Debtors have contemplated that the resolution of Creditor’s claim may
18 be covered by the Debtors’ Insurance Policy, and possibly may be resolved without further
19 contribution of the Debtors of the estate and have entered into a stipulation to amicably
20 resolve the matter.

21 **II. SUMMARY OF THE STIPULATION**

22 Wherefore, Creditor and Debtors seek this Court’s approval of their Stipulation to
23 modify the automatic stay under 11 U.S.C. § 362(a), and grant Creditor relief for the
24 limited purpose of prosecuting the McNair Action as it relates to the prepetition claims, as
25 well as settlement discussions, if any, application or potential of the Insurance Policy, and
26 related or ancillary process. Creditor shall not seek to enforce his claim against the
27 Debtors or the estates, other than to seek recovery under the Insurance Policy for the claim
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1 asserted in the McNair Action. Aside from such rights and interests arising under the
2 Insurance Policy, no property of the Debtors or Debtors' estates may be disposed of
3 outside of the bankruptcy proceedings while they remain pending, unless otherwise
4 ordered. Creditor agrees to waive any claim against the Debtors or property of the
5 Debtors' estate, except as to recovery under the Insurance Policy, as long as the Debtors'
6 bankruptcy cases are pending.

7 A true and correct copy of the Stipulation Regarding Relief from Automatic Stay
8 Under 11 U.S.C. Section 362 (Action in Non-Bankruptcy Forum) is attached hereto as
9 **Exhibit "2."**

10 **III. AUTHORITY**

11 Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to
12 proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for
13 the following reasons:

- 14 - Movant seeks recovery only from applicable insurance, if any, and waives any
15 deficiency or other claim against the Debtor or property of the Debtor's
16 bankruptcy estate; and
- 17 - The Claims arise under nonbankruptcy law and can be most expeditiously
18 resolved in the nonbankruptcy forum.

19 (11 U.S.C. § 362)

20 Creditor requests relief from the stay pursuant to 11 U.S.C. § 362(d)(1) such that
21 Creditor may proceed under applicable nonbankruptcy law to enforce its remedies to
22 proceed to final judgment in the nonbankruptcy forum, provided that the stay remains in
23 effect with respect to enforcement of any judgment against the Debtor or property of the
24 Debtor's bankruptcy estate.

25 (11 U.S.C. § 362)

26 Creditor also requests the 14-day stay prescribed by FRBP 4001(a)(3) is waived
27 further pursuant to the Stipulation between the Creditor and Debtors.

28 ///

1 **IV. CONCLUSION**

2 Wherefore, Debtor asks this Court to grant his Motion to Approve the Stipulation
3 and modify the automatic stay such that: (1) Creditor may proceed under applicable
4 nonbankruptcy law to enforce its remedies to proceed to final judgment in the
5 nonbankruptcy forum; (2) waive the 14-day stay; and (3) for any other relief deemed
6 necessary and proper.

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8 Dated: 1/22/2020

LAW OFFICES OF MICHAEL JAY BERGER

9
10 By:


11 Michael Jay Berger
12 Counsel for Creditor
13 Sean McNair
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1. I am an Attorney at Law, licensed to practice before all of the courts in the State of California, and in the United States District Court for the Central District of California. I have personal knowledge of the facts set forth below and if called to testify as to those facts, I could and would competently do so.

3. Creditor Sean McNair (“Creditor”) is the plaintiff in a prepetition lawsuit against the Debtors filed in the Superior Court of the State of California County of Los Angeles (Case No. BC708263, *Sean McNair v. Yareb Ishel Garcia, et al.*) (the “McNair Action”). A true and correct copy of the Complaint in the McNair Action is attached hereto as **Exhibit “1.”**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed on January 22, 2020 at Beverly Hills, California.



Michael Jay Berger

EXHIBIT-1

90025

Hamed Yazdanpanah, Esq. # 195810
 LAW OFFICES OF HAMED YAZDANPANA
 & ASSOCIATES
 9454 Wilshire Blvd., 6th Floor
 Beverly Hills, CA 90212
 (310) 777-8310

Attorney for Plaintiff

Electronically
FILED

by Superior Court of California
 County of Los Angeles on

06/1/18

Sheri R. Carter, Executive Officer/Clerk

By R. Monterroso Deputy
 Rosa Monterroso

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
 LOS ANGELES COUNTY

SEAN MCNAIR

Plaintiff,

vs.

YAREB ISHEL GARCIA; DANEYDA
 GARCIA; YARED GARCIA; AND DOES
 1-50 INCLUSIVE

Defendant,

CASE NO. BC708263

COMPLAINT FOR DAMAGES
 (NEGLIGENCE)

UNLIMITED CIVIL CASE
 DEMAND IS MORE THAN \$25,000.00

COMES NOW, the plaintiff and for Cause of Action against
 defendants, and each of them, complains and alleges as follows:

FIRST CAUSE OF ACTION

1. The true names and capacities, whether individual, corporate,
 associate, or otherwise of defendants, DOES 1 through 50, inclusive,
 are at this time unknown to plaintiff who therefore sues said
 defendants by such fictitious names. Plaintiff is informed and
 believes and thereon alleges that each of the defendants designated
 herein by a fictitious name is in some way negligent or responsible

BC708263

1 for the events and happenings herein referred to which proximately
2 resulted in those injuries and damage to the plaintiff as herein
3 alleged.

4 2. At all times herein mentioned, defendants, DOES 20 through 30,
5 inclusive, and each of them, were doctors, physicians, nurses, health
6 care providers and the like who treated and cared for plaintiff herein
7 and who were responsible in some manner for the plaintiff's injuries
8 and damages as more fully set forth herein.

9 3. At all times herein mentioned, defendants, DOES 31 through 40,
10 inclusive, and each of them, were manufacturers, suppliers and
11 distributors of some unknown product, which was responsible in part
12 for plaintiff's injuries and damages as more fully set forth herein.

13 4. At all times herein mentioned, defendants, DOES 1 through 20,
14 and each of them, were business entities, form unknown, duly qualified
15 to do business and lawfully doing business in the County of Los
16 Angeles, State of California.

17 5. Plaintiff is informed and believes, and upon such information
18 and belief, alleges that at all times herein mentioned, defendants,
19 and each of them, were acting as the agents, servants, and/or
20 employees of the other named defendants, and were within the course
21 and scope of their employment and with the full knowledge and consent
22 of each of the other named defendants. Each defendant subsequently
23 ratified and condoned the conduct of each remaining defendant.

24 6. At all times herein mentioned, defendants **YAREB ISHEL GARCIA;**
25 **DANEYDA GARCIA; YARED GARCIA; AND DOES 1-50 INCLUSIVE** and each of
26 them, were the owners and operators of a vehicle, bearing California
27 license plates, hereinafter referred to as defendants vehicle.

28 ///

BC708263

1 7. At all times herein mentioned, plaintiff, **SEAN MCNAIR** an
2 individual, was the driver of a certain vehicle more full described as
3 a **LEXUS** hereinafter referred to as plaintiff's vehicle.

4 8. At all times herein mentioned, **SANTA MONICA**, is a public
5 street in the County of **LOS ANGELES**, State of California (hereinafter
6 referred to as "subject location").

7 9. On or about **June 11, 2016**, at the subject location, the
8 defendants, and each of them, so negligently entrusted, managed,
9 maintained, drove, and operated said defendants' vehicle so as to
10 cause defendants' vehicle to collide with the plaintiff's vehicle
11 proximately causing those injuries and damages to the plaintiff as
12 hereinafter described.

13 10. That as a direct and proximate result of the acts and
14 omissions of the defendants, and each of them, plaintiff has received
15 severe injuries to Plaintiff's body and shock and injuries to
16 Plaintiff's nervous system, all of which caused him severe pain and
17 discomfort and plaintiff is informed and believes and based upon such
18 information and belief alleges that she will in the future suffer
19 severe pain and discomfort, all to Plaintiff's general damage in a sum
20 according to proof at the time of trial.

21 11. That as a direct and proximate result of the acts and
22 omissions of the defendants, and each of them, and the injuries
23 resulting therefrom, plaintiff has required and is informed and
24 believes she will in the future require, the services of doctors,
25 surgeons, physicians, nurses, hospitals, and the like-related
26 professional services, including drugs, medicines, x-rays and medical
27 expenses, and the exact and reasonable amount of said services and
28

Complaint for Damages

BC708263

1 liabilities will conform to proof at the time of trial of this action.

2 12. That prior to that date of the injuries to plaintiff was a
3 able-bodied person capable of carrying on Plaintiff's usual
4 occupation. That as a direct and proximate result of the acts and
5 omissions of the defendants, and each of them, and the injuries
6 resulting therefrom, this plaintiff has been unable to carry out
7 Plaintiff's usual occupation and will thereby suffer damages by reason
8 of loss of income; that the exact and reasonable amount of said loss
9 of income is unknown to this plaintiff, who will ask leave of court to
10 prove the reasonable value of said loss at the time of trial of this
11 action.

12 WHEREFORE, plaintiff prays for judgement against the defendants,
13 and each of them as follows:

14 1. General damages in an amount which will conform to proof at
15 the time of trial;

16 2. Special damages for medical, hospital, x-rays and other
17 incidental expenses, according to proof at the trial;

18 3. Cost of suit incurred herein; and

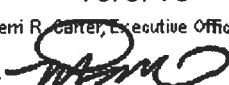
19 4. For such other and further relief as the Court may deem just
20 and proper.

21 Dated: **June 1, 2018**

LAW OFFICES OF HAMED YAZDANPANAH
& ASSOCIATES

24 By: 
25 Hamed Yazdanpanah
26 Attorney for Plaintiff

28 **Complaint for Damages**

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY OR PARTY WITHOUT ATTORNEY: LAW OFFICE OF HAMED YAZDANPANAH & ASSOCIATES HAMED YAZDANPANAH, ESQ. 9454 WILSHIRE BLVD., 6TH FLOOR, BEVERLY HILLS CA 90212		STATE BAR NUMBER 195810	<i>Reserved for Clerk's File Stamp</i> Electronically FILED by Superior Court of California County of Los Angeles on 10/9/18 Sherri R. Carter, Executive Officer/Clerk By:  Deputy Maisha Pryor
ATTORNEY FOR (Name): Plaintiff, SEAN MCNAIR			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS: 312 North Spring Street, Los Angeles, CA 90012			
PLAINTIFF: SEAN MCNAIR			
DEFENDANT: YAREB ISHEL GARCIA ET AL			CASE NUMBER BC708263 Dept 4
AMENDMENT TO COMPLAINT (Fictitious /Incorrect Name)			

☒ **FICTITIOUS NAME (No order required)**

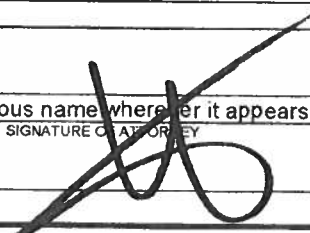
Upon the filing of the complaint, the plaintiff, being ignorant of the true name of the defendant and having designated the defendant in the complaint by the fictitious name of:

FICTITIOUS NAME
DOES 1

and having discovered the true name of the defendant to be:

TRUE NAME
Scoobeez Global, Inc.

amends the complaint by substituting the true name for the fictitious name wherever it appears in the complaint.

DATE 10-08-2018	TYPE OR PRINT NAME HAMED YAZDANPANAH	SIGNATURE OF ATTORNEY 
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☐ **INCORRECT NAME (Order required)**

The plaintiff, having designated a defendant in the complaint by the incorrect name of:

INCORRECT NAME

and having discovered the true name of the defendant to be:

TRUE NAME

amends the complaint by substituting the true name for the incorrect name wherever it appears in the complaint.

DATE	TYPE OR PRINT NAME	SIGNATURE OF ATTORNEY
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ORDER

THE COURT ORDERS the amendment approved and filed.

Dated

Judicial Officer

EXHIBIT-2

1 MICHAEL JAY BERGER (SBN 100291)
2 THE LAW OFFICES OF MICHAEL JAY BERGER
3 9454 Wilshire Blvd., 6th Floor
4 Beverly Hills, CA 90212
5 Tel.: (310) 271-6223
6 Fax: (310) 271-9805
7 E-mail: michael.berger@bankruptcypower.com

8 Counsel for Creditor,
9 Sean McNair

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

SCOOBEEZ, et al.,

Debtors and Debtors-
in-Possession.

Affects:

- All Debtors
 - o Scoobeez, ONLY
 - o Scoobeez Global, Inc., ONLY
 - o Scoober, LLC, ONLY

Case No. 2:19-bk-14989-WB

Chapter 11

Jointly Administered With Case Nos.; 2:19-bk-
14991-WB and 2:19-bk-14997-WB

**STIPULATION REGARDING RELIEF
FROM AUTOMATIC STAY UNDER 11
U.S.C. SECTION 362 (ACTION IN NON-
BANKRUPTCY FORUM)**

[Hearing Not Required]

TO THE HONORABLE JULIA W. BRAND, JUDGE OF THE UNITED
STATES BANKRUPTCY COURT, TO THE UNITED STATES TRUSTEE AND
TO ALL INTERESTED PARTIES:

Creditor Sean McNair (the "Creditors"), on the one hand, and Scoobeez, together
with Scoobur, LLC and Scoobeez Global, Inc. (each a "Debtor" and, collectively, the

1 “Debtors”), by and through their respective counsel of record, hereby stipulate and agree
2 as follows:

3 WHEREAS, Creditor is the plaintiff in a lawsuit against Debtor (Scoobez Global,
4 Inc.) and other named defendants, filed in the Superior Court of the State of California,
5 County of Los Angeles, designated case no.: BC708263, styled Sean McNair v. Yareb
6 Ishel Garcia, et al. (the “McNair Action”);

7 WHEREAS, the McNair Action predates the above-captioned bankruptcy filing by
8 Debtors; and

9 WHEREAS, Creditor’s claims against Debtors are or may be covered by a policy
10 of insurance (the “Insurance Policy”); and Debtors and Creditor have contemplated that
11 the resolution of Creditor’s claim may be covered by such Insurance Policy and
12 otherwise without contribution of the Debtors or the estate.

13 NOW, THEREFORE, Creditor and Debtors hereby stipulate and agree as follows:

14 1. The automatic stay of 11 U.S.C. Section 362(a) may and shall be modified,
15 terminated and annulled as to Creditor, only for the limited purpose of prosecuting the
16 pending McNair Action relating to pre-petition claims, as well as settlement discussions,
17 if any, application or potential application of the Insurance Policy, and related or
18 ancillary process.

19 2. Creditor shall not seek to enforce his claim against Debtors or Debtors’
20 property or estate, other than to seek recovery under the Insurance Policy for the claims
21 asserted in the McNair Action; and aside from such rights and interests arising under the
22 Insurance Policy, no property of Debtor or Debtors’ estate may be disposed of outside of
23 these bankruptcy proceedings while they remain pending, unless otherwise ordered.

24 3. Except as to recovery under the Insurance Policy as provided herein,
25 Creditor waives any claim against the Debtors or property of the Debtors’ estates as long
26 as the Debtors’ bankruptcy case is pending.

27 3. The Creditor shall lodge a proposed order approving this stipulation in a
28 form acceptable to counsel for the Debtors.

1 5. The provisions of the Stipulation shall be binding upon and inure to the
2 benefit of the respective parties and their heirs, executors, administrators, agents,
3 representatives, successors, transferees and assigns.

4 6. The effectiveness of any order entered approving this Stipulation and
5 granting relief from the automatic stay on the terms set forth herein shall take effect
6 immediately, and the fourteen (14) day period set forth in Federal Rule of Bankruptcy
7 Procedure 4001(a)(3) shall not apply.

8
9 SO AGREED:

10
11 THE LAW OFFICES OF MICHAEL JAY BERGER

12
13 Dated: 10/30/19

By: 

Michael Jay Berger
Counsel for the Creditor,
Sean McNair

14
15
16
17 FOLEY & LARDNER LLP

18
19
20 Dated: October 30, 2019

By: 

Shane J. Moses
Counsel for Debtors and Debtors-in-
Possession, Scoobeez, Scoobeez Global, Inc.,
and Scoobur, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

9454 Wilshire Blvd., 6th Fl., Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION AND MOTION TO APPROVE STIPULATION REGARDING RELIEF FROM AUTOMATIC STAY UNDER 11 U.S.C. SECTION 362 (ACTION IN NON-BANKRUPTCY FORUM); DECLARATION OF MICHAEL JAY BERGER IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 1/22/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 1/22/2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Sean McNair (Movant & Creditor)
c/o Hamed Yazdanpanah & Associates
9454 Wilshire Blvd., 6th Floor
Beverly Hills, CA 90212

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 1/22/2020 I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Julia W. Brand
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1382 / Courtroom 1375
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/22/2020
Date

Peter Garza
Printed Name

/s/Peter Garza
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

2. SERVED BY UNITED STATES MAIL:

Richard T Baum rickbaum@hotmail.com, rickbaum@ecf.inforuptcy.com
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Dare Law dare.law@usdoj.gov
Bret D Lewis Bretlewis@aol.com, bdlawyager@gmail.com
**Debtor's Counsel: Ashley M McDow amcdow@foley.com, sgaeta@foley.com; mhebbeln@foley.com;
swilson@foley.com; jsimon@foley.com; VGoldsmith@foley.com**
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Eric K Yaeckel yaeckel@sullivanlawgroupapc.com